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July 24, 2025

VIA ECF

United States District Judge Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203

Re: Structured Asset Sales, LLC v. Sheeran, 20-cv-4329-RA-SN

Dear Judge Abrams:

I represent Plaintiff Structured Asset Sales, LLC in the above-referenced matter. In accordance with Your Honor's June 24, 2025 Endorsement (ECF 113), I have conferred with counsel for Defendants, and submit this joint letter with their consent.

Plaintiff anticipates filing or seeking leave to file an Amended Complaint in this matter. The parties respectfully propose that the case proceed in accordance with the following schedule, all parties reserving all of their rights accordingly:

- Plaintiff shall furnish Defendants with a copy of the proposed Amended Complaint by August 29, 2025.
- Defendants shall advise Plaintiff and the Court whether they consent to the filing of the proposed Amended Complaint by September 12, 2025.
- If Defendants consent to the filing of the proposed Amended Complaint, Defendants shall answer or move in relation to it by October 15, 2025, Plaintiff shall oppose any motion by November 12, 2025, and Defendants shall reply by November 26, 2025.
- If Defendants do not consent to the filing of the proposed Amended Complaint, then Plaintiff shall file a motion for leave to amend by October 13, 2025, Defendants shall oppose by November 10, 2025, and Plaintiff shall reply by November 24, 2025.

The parties further agree that a Proposed Case Management Plan should be submitted after the potential motions reflected above are determined or if no motions are filed, once issue is joined.

July 24, 2025

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Hillel Parness", written in a cursive style.

Hillel I. Parness

cc: Counsel of Record (via ECF)